

May 28, 2004

Sarah Loftus McLallen
ACC Petroleum Additives Panel
American Chemistry Council
1300 Wilson Boulevard
Arlington, VA 22209

Dear Ms. McLallen:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Benzoic acid, 2-hydroxy-, mono-C14-18 alkyl derivatives, calcium salts posted on the ChemRTK HPV Challenge Program Web site on January 27, 2004. I commend the Petroleum Additives Panel Health, Environmental, and Regulatory Task Group (HERTG) for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. Data/information provided for water solubility, partition coefficient, melting point, biodegradation, and hydrolysis are adequate for the purposes of the HPV Challenge Program. EPA agrees with the submitter's proposal to perform boiling point and vapor pressure tests on "AI-43," but the test protocols need to be identified. Regarding the environmental fate endpoints, EPA agrees with the submitter's proposal except that it is suggested that the fugacity model be run using Level III instead of Level I.
2. Health Effects. Data provided on acute toxicity and gene mutations are adequate for the purposes of the HPV Challenge Program. EPA agrees with the submitter's proposal to perform repeated-dose, reproductive, developmental and chromosomal aberration toxicity tests. Although the test material and test protocols were not specified, EPA suggests that OECD TG 422 (repeated-dose/reproductive/developmental toxicity screening protocol) and OECD TG 473 (in vitro cytogenetic assay) protocols be used with "AI-43" per HPV Challenge Program guidance.
3. Ecological Effects. Data provided on the aquatic toxicity to fish, invertebrates, and algae are adequate for the purposes of the HPV Challenge Program.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that HERTG advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: W. Penberthy
M. E. Weber